

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

KEISHA CHEESEMAN,

PLAINTIFF,

VS.

CV NO.: 5:22-cv-00222-AKK

**TELEPERFORMANCE BUSINESS
SERVICES US, LLC.,**

DEFENDANT.

**JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT
AND DISMISSAL OF CLAIMS WITH PREJUDICE**

COME NOW the parties in the above-styled action, Plaintiff Keisha Cheeseman (“Plaintiff”) and Defendant Teleperformance Services US, LLC (“Defendant”), and jointly move for an Order approving the settlement agreement between the parties to resolve the above-styled action. As grounds for their Motion, the parties states as follows:

1. Plaintiff filed a four-count Complaint on February 18, 2022. (Doc. 1). Plaintiff alleged causes of action for quantum meruit and violation of the Fair Labor Standards Act's minimum wage provision in connection with the alleged failure of Defendant to pay her for 40 hours of training that occurred during a single week in May 2021. Plaintiff also alleged that Defendant violated the Fair Labor Standards Act's retaliation provision when it terminated her employment shortly thereafter. In

addition, Plaintiff alleged Defendant violated the Consolidated Omnibus Budget Reconciliation Act by allegedly failing to provide her with the required post-termination notice.

2. Defendant filed an Answer and Affirmative Defenses on May 2, 2022. (Doc. 13). Defendant denied that it violated the Fair Labor Standards Act or the Consolidated Omnibus Budget Reconciliation Act in connection with Plaintiff's employment and otherwise denied all liability in connection with the action.

3. In an effort to avoid expenses associated with the litigation of this action, mitigate the risk of prevailing or not prevailing on the merits, or any appeal or post-verdict motions that may be filed, the parties mediated the case with the assistance of Heather Leonard on June 28, 2022 and reached settlement agreement on July 1, 2022. The settlement is memorialized in a document titled "Settlement Agreement and Full and Final General Release."

4. The parties have previously provided the Court, *in camera*, a copy of the Settlement Agreement and Full and Final General Release signed by Plaintiff and Defendant.

5. Among other things, the settlement provides Plaintiff with full payment for the disputed 40 hours of training and full payment of her alleged liquidated damages in connection with her minimum wage claim.

6. The parties stipulate to that a final dismissal order be entered by the Court.

7. The parties certify that ALLEN D. ARNOLD has permission to file this Joint Motion for Approval of Settlement Agreement and Dismissal of Claims with Prejudice on behalf of all parties.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2022, I filed a copy of the foregoing with the Clerk of this Court using the CM/ECF system of filing which will forward a copy to counsel for the Defendant at the following address:

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